

## **How To Develop a Written Personnel Training Plan**

### **WAC 173-303-330**

- Step 1:** Identify positions that handle dangerous waste. Include those positions that:
- Add or remove waste from containers
  - Operate a recycling still, evaporator or wastewater treatment unit
  - Transfer waste from one area or container to another
  - Inspect dangerous waste accumulation areas
  - Label containers
  - Prepare waste for transport
- Step 2:** For each position identified, write a job description that includes the dangerous waste activities that are performed in that position.
- Step 3:** Identify the relevant training needs for each position
- Level One
  - Level Two
  - Level Three
- Step 4:** Train employees to do their job in compliance with the *Dangerous Waste* regulations.
- Step 5:** Document and keep training records.

**Steps 1&2: Identify positions that handle dangerous waste and write a job description for each position.**

**Job Title:** \_\_\_\_\_

**Job Description:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Job Title:** \_\_\_\_\_

**Job Description:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

**Job Title:** \_\_\_\_\_

**Job Description:** \_\_\_\_\_  
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\_\_\_\_\_

**Job Title:** \_\_\_\_\_

**Job Description:** \_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### **Step 3. Identify Training Levels**

Level One: Positions whose jobs only require adding or removing waste to container or tanks.

Level Two: Positions whose jobs require the transferring of wastes from satellite accumulation areas to final accumulation areas.

Positions whose jobs require access to a satellite accumulation area.

Positions whose jobs require operating a solvent still, an evaporator or wastewater treatment unit.

Positions whose jobs require filling out manifests.

Level Three: Positions whose jobs require inspecting accumulation areas and or emergency response equipment.

Positions whose jobs require clean-up and response to spills and emergencies.

Positions whose jobs require training new employees.

## **Sample Training Plans for Each Level**

### **Level One:**

- ☐ Employees must understand that all hazardous waste containers are to be kept closed except when adding or removing wastes.
- ☐ Employees must be familiar with emergency equipment and emergency procedures.

### **Level Two:**

- ☐ Everything in Level One.
- ☐ Employees must understand that the satellite accumulation drum of (insert the name of your satellite waste) needs to be dated on the date that the container became full.
- ☐ Employees must understand that when satellite accumulation drum exceeds 55-gallons, it needs to be dated, and transferred to the final accumulation area (specific location at your facility) within 3 days.
- ☐ Employees must understand that containers holding hazardous waste must be labeled with the words, "Hazardous Waste," "the Major Risk" and the accumulation start date.
- ☐ Employees must understand that Your Company Name is a Large Quantity Generator and has 90 days to ship waste off-site.
- ☐ Employee must understand that the amounts of solvent recycled and waste evaporated must be kept in a log, and that all other container management requirements are applicable.

### **Level Three:**

- ☐ Everything in Level One and Two.
- ☐ Employees must understand that weekly inspections of final and satellite accumulation area must be done and any problems must be noted on the inspection log, including the actions taken to correct the problem.
- ☐ Employees must understand that emergency equipment must be inspected weekly.
- ☐ Employees must know where the emergency equipment is kept and how to use it.

## **Examples of Positions and Training Levels**

Level One: Those employees with minimal contact to hazardous wastes.

Level Two: Those employees whom have extensive contact with hazardous wastes.

Painters

Machinists

Plating line workers

Silk-Screen Washers

Mechanics

Solvent Still Operators

Evaporation Unit Operators

Level Three: Those employees who supervise level two workers or who would respond to a hazardous materials emergency.

Environmental Health and Safety Managers

Emergency Responders/Coordinators

Supervisors of areas that generate hazardous wastes

## **Step 4: Develop and Deliver Training**

### **Container Management**

- Containers must be closed except when adding or removing waste
  - ✓ Locking type funnel is closed
  - ✓ Non-locking funnels are removed each time waste is added
  - ✓ Ring locks are securely fastened
- Rows of containers are separated by 30 inches of aisle space
- Containers are free of rusts, dents, and leaks.

### **Labeling:**

- Containers must be labeled “Hazardous Waste” or “Dangerous Waste”
- The major risk is identified: Flammable, Corrosive, Toxic.

### **Satellite Accumulation:**

- Our satellite accumulation areas are located \_\_\_\_\_.
- For each satellite accumulation area, the designated operators are \_\_\_\_\_.
- The operator(s) shall ensure the following:
  - ✓ There is no more than 55-gallons per waste stream in the satellite accumulation area.
  - ✓ The satellite accumulation containers are labeled “Hazardous Waste” or “Dangerous Waste” and the major risk (flammable, corrosive, toxic) is identified.
  - ✓ Once the satellite accumulation drum contains 55-gallons of waste, it is immediately dated with the accumulation start date, which for satellite accumulation container is the day that the container reached 55-gallons.
  - ✓ Once the satellite accumulation drum is full and dated, it will be removed within three days to the final accumulation area, which is located \_\_\_\_\_.

### **Accumulation Start Dates**

- All non-satellite containers will be labeled with the date waste first started accumulating in the container.
- Satellite containers will be dated when the container reaches 55-gallons.
- Our company has 90 days to ship the waste off-site.
- When the date on the container indicates that the waste has been on-site for 80 days, call \_\_\_\_\_.

### **Weekly Inspections**

- Weekly inspections of the satellite and final accumulation areas shall be conducted by \_\_\_\_\_.
- A “Weekly Inspection Log” can be found \_\_\_\_\_.
- Problems and any actions taken to correct problems shall be noted on the log.
- Emergency equipment and spill kits will also be inspected to ensure that the necessary supplies are available.

## Step 5: Document and Keep Training Records

### *Sample Employee Training Record*

Name \_\_\_\_\_

Job Title \_\_\_\_\_

Hire Date \_\_\_\_\_

Job Description \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

☐ Initial Training

☐ Annual Refresher

The above employee has received the following hazardous waste training, which is appropriate to the job description. Check all boxes that apply.

- ☐ I understand that all hazardous waste containers are to be kept closed except when adding or removing wastes.
- ☐ I understand that the satellite accumulation drum of (insert the name of your satellite waste) needs to be dated on the date that the container became full.
- ☐ I understand that when satellite accumulation drum exceeds 55-gallons, it needs to be transferred to the final accumulation area (specific location at your facility) within 3 days.
- ☐ I understand that containers holding hazardous waste must be labeled with the words, "Hazardous Waste," "the Major Risk" and the accumulation start date.
- ☐ I understand that Your Company Name is a Large Quantity Generator and has 90 days to ship waste off-site.
- ☐ I understand that I am to conduct weekly inspections of the final accumulation area, and note any problems on the inspection log, and what actions I took to correct the problem.
- ☐ I know where the emergency equipment is kept and how to use it.

\_\_\_\_\_  
Supervisor/Trainer

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Date

## Sample: Weekly Inspection Checklist

- ☐ Drums and containers have a hazardous waste and risk label.
- ☐ Non-satellite accumulation containers are marked with the accumulation start date.
- ☐ Drums and other hazardous waste containers are closed.
- ☐ Labels are visible and readable.
- ☐ Drum are in good shape: no leaks, dents, or rust.
- ☐ 30 inches of aisle space is maintained between rows of drums.
- ☐ The secondary containment does not have any liquids in it.
- ☐ Fire extinguishers are charged.
- ☐ Spills kits are stocked.
- ☐ Emergency shower and eyewash are functioning properly.
- ☐ Emergency phone numbers are posted near the phone.
- ☐ Comments: Use this space to describe the actions you took to correct anything noted above and the date that the problem was corrected. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Date



